

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE**

STATE OF TENNESSEE; )  
COMMONWEALTH OF VIRGINIA, )  
Plaintiffs, )      Case No. 3:24-cv-00033-DCLC-DCP  
v. )  
NATIONAL COLLEGIATE ATHLETIC )  
ASSOCIATION, )  
Defendant. )

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**JOINT STIPULATION REQUESTING EXTENSION OF TIME TO AMEND  
COMPLAINT AND RESPOND AND [PROPOSED ORDER]**

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WHEREAS, Plaintiffs the State of Tennessee and the Commonwealth of Virginia filed a Complaint and Motion for Temporary Restraining Order and Preliminary Injunction in this action on January 31, 2024;

WHEREAS, this Court denied the temporary restraining order on February 6, 2024;

WHEREAS, this Court held a preliminary injunction hearing on February 13, 2024;

WHEREAS, this Court granted the preliminary injunction on February 23, 2024;

WHEREAS, the parties jointly stipulated to request an extension of the deadline for Defendant, the National Collegiate Athletic Association, to respond to the Complaint by May 1, 2024;

WHEREAS, the Court granted the parties' joint request for an extension on March 26, 2024; and

WHEREAS, Plaintiffs intend to amend their Complaint pursuant to Rule 15 of the Federal Rules of Civil Procedure, and Defendant has consented to that amendment.

NOW, THEREFORE, in the interest of efficiency and pursuant to Local Rule 12.1, the parties hereby jointly stipulate and agree that Plaintiffs shall file an Amended Complaint by May 1, 2024, and Defendant shall respond to the Amended Complaint by July 1, 2024, and request that the Court enter an order amending the deadlines accordingly.

Dated: April 12, 2024

Respectfully submitted,

By: /s/ Cameron T. Norris

Cameron T. Norris  
Thomas R. McCarthy  
David L. Rosenthal  
**CONSOVOY MCCARTHY PLLC**  
1600 Wilson Blvd., Suite 700  
Arlington, VA 22201  
(703) 243-9423  
cam@consovoymccarthy.com  
tom@consovoymccarthy.com  
david@consovoymccarthy.com

Adam K. Mortara  
**LAWFAIR LLC**  
40 Burton Hills Blvd., Suite 200  
Nashville, TN 37215  
(773) 750-7154  
mortara@lawfairllc.com

Patrick Strawbridge  
**CONSOVOY MCCARTHY PLLC**  
Ten Post Office Square  
8th Floor South PMB #706  
Boston, Massachusetts 02109  
(617) 227-0548  
patrick@consovoymccarthy.com

*Counsel for Plaintiffs*

Jonathan Skrmetti  
Attorney General of Tennessee

Lacey E. Mase  
Chief Deputy Attorney General  
J. David McDowell  
Deputy, Consumer Protection Division  
Ethan Bowers  
Senior Assistant Attorney General  
Tyler T. Corcoran  
Marilyn Guirguis  
Assistant Attorneys General

**Office of the Attorney General and Reporter**  
P.O. Box 20207

By: /s/ Rakesh N. Kilaru

Rakesh N. Kilaru (*Pro Hac Vice*)  
**WILKINSON STEKLOFF LLP**  
2001 M Street, NW, 10th Floor  
Washington, DC 20036  
(202) 847-4000  
rkilaru@wilkinsonstekloff.com

Robert E. Boston (Tenn. BPR # 009744)  
Taylor J. Askew (Tenn. BPR # 033193)  
(*Pro Hac Vice*)  
David J. Zeitlin (Tenn. BPR # 037664)  
(*Pro Hac Vice*)  
**HOLLAND & KNIGHT LLP**  
511 Union Street, Suite 2700  
Nashville, TN 37219  
Telephone: (615) 244-6380  
bob.boston@hklaw.com  
taylor.askew@hklaw.com  
david.zeitlin@hklaw.com

*Attorneys for Defendant National  
Collegiate Athletic Association*

Nashville, TN 37202  
(615) 741-8722  
[Ethan.Bowers@ag.tn.gov](mailto:Ethan.Bowers@ag.tn.gov)  
[Tyler.Corcoran@ag.tn.gov](mailto:Tyler.Corcoran@ag.tn.gov)

*Counsel for Plaintiff State of Tennessee*

Jason S. Miyares  
Attorney General of Virginia

Steven G. Popps  
Deputy Attorney General, Civil Division  
Tyler T. Henry  
Assistant Attorney General & Manager,  
Antitrust Unit  
Jonathan M. Harrison II  
Assistant Attorney General, Consumer  
Protection

**Office of the Attorney General**  
202 North 9th Street  
Richmond, Virginia 23219  
(804) 692-0485  
[THenry@oag.state.va.us](mailto:THenry@oag.state.va.us)  
[JHarrison@oag.state.va.us](mailto:JHarrison@oag.state.va.us)

*Counsel for Plaintiff Commonwealth of  
Virginia*

**CERTIFICATE OF CONSENT**

In accordance with Rule 6 of the ECF Rules & Procedures for the Eastern District of Tennessee, I hereby certify that I have obtained consent for this electronic filing from all signatories listed above.

Dated: April 12, 2024

Respectfully submitted,

By: /s/ Rakesh N. Kilaru

Rakesh N. Kilaru  
**WILKINSON STEKLOFF LLP**  
2001 M Street NW, 10th Floor  
Washington, DC 20036  
Telephone: (202) 847-4000  
Facsimile: (202) 847-4005  
rkilaru@wilkinsonstekloff.com

*Attorney for Defendant National Collegiate Athletic Association*